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Attorneys for Defendant
FALLS LAKE NATIONAL INSURANCE COMPANY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

| | | |
|--|---|------------------------------------|
| GOLDEN OPPORTUNITY INVESTMENTS, LP; AND PAMA MANAGEMENT, INC., |) | Case No. 2:21-cv-00511-TLN-KJN |
| Plaintiffs, |) | STIPULATION AND ORDER |
| vs. |) | EXTENDING DISCOVERY CUTOFF |
| FALLS LAKE NATIONAL INSURANCE COMPANY and DOES 1 to 50, inclusive, |) | Complaint Filed: November 19, 2020 |
| Defendants. |) | |

IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES TO THIS ACTION,
through their undersigned counsel, as follows:

1. Pursuant to the timelines established by this Court's Initial Pretrial Scheduling Order,
adopted by the parties in their Joint Rule 26(f) Discovery Plan, the last date for completion of non-

1 expert discovery is November 22, 2021.

2 2. Good cause exists for the extension of the current non-expert discovery cutoff. The
3 parties desire to proceed to voluntary mediation in this matter. They have agreed to mediate before
4 Michael Ornstil, Esq., of JAMS on November 30, 2021. In order to facilitate mediation, the parties
5 wish to direct time and resources toward mediation and agree to extend the time to complete non-
6 expert discovery until after the initial mediation and any followup mediation discussions have
7 concluded.

8 3. The parties stipulate and agree to extend the non-expert discovery cutoff for a period
9 of approximately 75 days from November 22, 2021 through and including February 7, 2022. (Note
10 that 75 days ends on Saturday, February 5, 2022, so we have extended the deadline out to the following
11 Monday, February 7, 2022.)

12 4. This stipulated extension would allow the parties to conclude mediation and, if the
13 matter does not resolve, complete outstanding discovery in sufficient time to commence expert
14 discovery within the scheduled deadlines. This extension should not interfere with any other deadlines
15 or hearings currently set. This extension also accounts for the unavailability of counsel and witnesses
16 during the intervening holidays.

17 5. Based on the foregoing, the parties hereby stipulate to extend the non-expert discovery
18 cutoff from November 22, 2021 through and including February 7, 2022.

19 IT IS SO STIPULATED.

20
21 Dated: November 18, 2021

HESS BOWER ADAMS-HESS, PC

22 By: /s/ Pamela Bower

23 RANDY M. HESS
24 PAMELA A. BOWER
25 Attorneys for Plaintiffs
26 GOLDEN OPPORTUNITY INVESTMENTS,
27 LP and PAMA MANAGEMENT, INC.
28

1 Dated: November 18, 2021

HINSHAW & CULBERTSON LLP

2
3 By: /s/ Travis Wall

MARIA S. QUINTERO

4 TRAVIS WALL

Attorneys for Defendant

5 FALLS LAKE NATIONAL INSURANCE

COMPANY

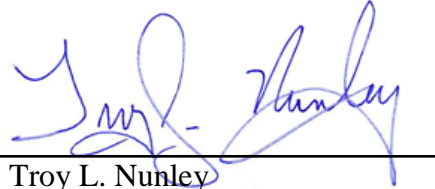
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7 **ORDER**

8 The Court having reviewed the foregoing stipulation of the parties, and good cause appearing
9 therefor, hereby orders as follows:

10 The non-expert discovery cutoff shall be and hereby is extended through and including
11 February 7, 2022.

12 IT IS SO ORDERED.

13
14 Dated: November 18, 2021

15
16 
Troy L. Nunley

United States District Judge

FILER'S ATTESTATION

I, Pamela Bower, am the ECF user whose identification and password are being used to file this STIPULATION AND PROPOSED ORDER EXTENDING DISCOVERY CUTOFF. In compliance with Local Rules, I hereby attest that all party signatories hereto concur in this filing.

/s/ Pamela Bower
PAMELA BOWER